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IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. ALLEN FONG, YA HUAI HUNG, ROBERT CHUN, JIE MU, LAURENCE SHU KWAN LEE, KEVIN HARTIG, WAYLEN FONG, ANGELINA CHUONG, and CHONTHICHA JAEMRATANASOPHIN, Defendants.	No. CR 14-0527-RS STIPULATION AND [~~PROPOSED~~] ORDER EXCLUDING TIME UNDER THE SPEEDY TRIAL ACT, 18 U.S.C. § 3161 ET. SEQ

The United States of America, by and through its attorney of record, and the above-captioned defendants (“defendants”), by and through their respective attorneys of record, hereby stipulate as follows:

1. The United States produced the initial discovery package shortly after defendants’ arraignments. Upon assignment of a discovery coordinator in or about February 2015, the United States made five additional productions of voluminous discovery to the discovery coordinator.

The discovery coordinator provided a hard drive of the materials to defense counsel in September 2015. Defense counsel are now reviewing those materials.

2. For the reasons stated above, the parties stipulate and agree that this matter should be continued from October 20, 2015 at 2:30pm to December 8, 2015 at 2:30pm, and that the failure to grant such a continuance would unreasonably deny the defendants the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The parties further stipulate and agree that the time from October 20, 2015 at 2:30pm to December 8, 2015 at 2:30pm should be excluded on the basis that the ends of justice are served by taking such action which outweigh the best interest of the public and the defendants in a speedy trial and for effective preparation of counsel, taking into account the exercise of due diligence, under 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).

Dated: October 15, 2015

Respectfully submitted,

/s/

DEBORAH R. DOUGLAS
Assistant United States Attorney

/s/

GALIA AMRAM PHILLIPS, Esq.
Attorney for Defendant Allen Fong

/s/
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GARRICK S. LEW, Esq.
RICHARD G. HULLINGER, Esq.
Attorneys for Defendant Ya Huai Hung

/s/
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RANDALL KNOX, Esq.
Attorney for Defendant Robert Chun

/s/
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BRIAN GETZ, Esq.
MARK GOLDROSEN, Esq.
Attorney for Defendant Jie Mu

/s/
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ALAN DRESSLER, Esq.
Attorney for Defendant Laurence Shu Kwan Lee

/s/
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SETH CHAZIN, Esq.
Attorney for Defendant Kevin Hartig

/s/
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GILBERT EISENBERG, Esq.
Attorney for Defendant Waylen Fong

/s/
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ALEXANDRA McCLURE, Esq.
Attorney for Defendant Angelina Chuong

/s/
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SCOTT SUGARMAN, Esq.
Attorney for Defendant Chonthicha Jaemratanasophin

ORDER

Upon the parties' stipulation, and GOOD CAUSE appearing, IT IS HEREBY ORDERED that the above-captioned matter shall be continued from October 20, 2015 at 2:30pm to December 8, 2015 at 2:30pm, and that the time from October 20, 2015 to December 8, 2015, shall be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv). The Court finds that (A) failure to grant the continuance would unreasonably deny the defendants the reasonable time necessary for effective preparation, taking into account the exercise of due diligence; and (B) the ends of justice served by the continuance outweigh the best interests of the public and the defendants in a speedy trial.

IT IS SO ORDERED.

Dated: October 19, 2015

HON. RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE